

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

)
)
)
)
)
)
)
)
)
)
)

This Document Relates to:
Julie and John Doorn
MDL Case No. MD-15-02641-DGC
Civil Action No. 2:18-cv-01077-DGC

PLAINTIFF'S MOTION TO DISMISS WITH PREJUDICE

IT IS HEREBY STIPULATED AND AGREED, that Plaintiffs, Julie and John Doorn, hereby dismisses all claims in this matter with prejudice against all Defendants in this action, Civil Action No. 2:18-cv-01077 only. This motion shall not affect the lawsuit filed by Julie Doorn, which is currently pending in MDL No. 2641 in the United States District Court for the District of Arizona, bearing Case No. 2:16-cv-01421-DGC.

Respectfully submitted,

Dated this 13th day of September, 2018

/s/ Sarah A. Wolter
Sarah A. Wolter
ANDRUS WAGSTAFF, PC
7171 W Alaska Drive
Lakewood, CO 80226
Telephone: 303-376-6360
Facsimile: 303-376-6361
sarah.wolter@andruswagstaff.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, this 13th day of September, 2018, I have electronically filed a copy of the above and foregoing with Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

/s/Sarah A. Wolter